



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

[Click Here to Return to Main Ind x](#)

N60087.AR.001201  
NAS BRUNSWICK  
5090.3a

ANGUS S. KING, JR.  
GOVERNOR

MARTHA KIRKPATRICK  
COMMISSIONER

July 23, 2002

Mr. Orlando Monaco  
Department of Navy  
Engineering Field Activity-Northeast  
Code 1823/OM  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090

Re: Supplemental Comments-Site 7 Record of Decision  
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Last week representative for EPA, MEDEP, and the technical advisor for Brunswick Area Citizens for a Safe Environment (BASCE) discussed the proposed institutional controls for Site 7. Based on that discussion, Kate Zeeman, out toxicologist, performed a cursory review of the risk assessment (March 1992) for Site 7. It appears that residential risk for soils exceeds  $1 \times 10^{-5}$ . Although the soil removal performed last year may have eliminated the risk, soil analysis would be necessary to confirm that PAHs and DDT are no longer a risk in shallow soils. Therefore if residential use was ever proposed for this site, the risk levels would have to be revisited. Until that time it will be necessary to incorporate institutional controls for the soils at site 7.

At the time that the risk assessment and Feasibility Study (FS) were performed, only the Maximum Contaminant Levels were used for comparison and, as stated in the FS, the MCL for manganese was considered a secondary MCL, based on taste, color, or odor. However in 1994, MEDEP adopted the Maximum Exposure Guidelines (MEG) for groundwater which are risk based. Manganese currently exceeds its MEG (200 ppb) and must be included in the discussion in the Record of Decision (ROD) as a groundwater contaminant.

In spite of these revelations, MEDEP believes that the selected alternative will be protective of human health and the environment. I regret that these items last minute items, but it is important to include them in the ROD so that our successors will have a clear understanding of the issues when the time comes to close out this site.

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
(207) 764-0477 FAX: (207) 764-1507

I propose a conference call between the agencies and BASCE to discuss and refine the institutional controls for Site 7. If you have any questions or comments please call me at (207) 287-7713.

Respectfully,

A handwritten signature in black ink, appearing to read 'Claudia Sait', with a stylized flourish at the end.

Claudia Sait  
Project Manager-Federal Facilities  
Bureau of Remediation & Waste Management

Cf:     File  
         Larry Dearborn-DEP  
         Anthony Williams-BNAS  
         Michael Barry-EPA  
         Carolyn LePage-LePage Environmental  
         Al Easterday-EA  
         Ed Benedikt